



U.S. Department of Justice

*United States Attorney
Northern District of California*

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March 10, 2022

VIA EMAIL

Grant P. Fondo
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Re: United States v. Carlos E. Kepke, 3:21-cr-00155-JD (N.D. Cal.)

Dear Counsel:

As you requested, below is a description of several categories of material associated with Evatt Tamine.

Through counsel, Tamine provided documents to the government in 2018. These documents were reviewed for privilege by Tamine's attorneys who then made copies available to the government. The non-privileged documents were produced to you on February 7, 2022 bearing "ET" bates numbers. The approximately 19,000 documents tagged as privileged by Tamine's attorneys have not been produced to you. The government subsequently arranged to have copies of a number of the ET documents originally provided by Tamine pulled directly from devices seized by Bermudian authorities.

Authorities in Bermuda executed several search warrants at Tamine's residence. Materials seized are being reviewed for privilege and relevance by an attorney in the United Kingdom pursuant to an order from a Bermudian court. The first tranche of the non-privileged documents was produced to you on February 4, 2022 bearing "DOC" and "MLATSW" bates numbers. The government does not have access to documents tagged as privileged or personal/non-relevant by the reviewer in the United Kingdom. Additional documents seized by authorities in Bermuda are still being evaluated by the reviewer in the United Kingdom.

Tamine also provided electronic devices (mobile devices, laptops, external SSDs, and a memory card) to the government, for which forensic images and mobile device extractions collectively produced 1.4 TeraBytes of data. The data extracted from these devices has not been reviewed by the government and has not been reviewed for privilege.

Tamine also provided one box of paper documents to the government. These documents are currently being reviewed for privilege by Tamine's attorneys, and have not been reviewed by the government.

Please contact me if you have any questions concerning the foregoing.

Very truly yours,

STEPHANIE M. HINDS
United States Attorney

s/ Michael G. Pitman

MICHAEL G. PITMAN
Assistant United States Attorney